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Attorneys for Defendant
Akima Facilities Management, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DANIEL CRISOSTOMO,

Plaintiff,

v.

AKIMA FACILITIES MANAGEMENT,
LLC, and DOES 1 to 10,

Defendants.

Case No. 4:13-cv-05187-VC

**JOINT STIPULATION AND
~~[PROPOSED]~~ ORDER EXTENDING
TIME FOR DEFENDANT AKIMA
FACILITIES MANAGEMENT, LLC TO
FILE A RESPONSIVE PLEADING AND
SET SCHEDULING ORDER AS
MODIFIED**

Ctrm.: 4; 17th Floor
Judge: Hon. Vince Chhabria

Removal Filed: 11/6/2013
Trial Date: None Set

Plaintiff DANIEL CRISOSTOMO ("Plaintiff") and Defendant AKIMA FACILITIES MANAGEMENT, LLC ("Defendant"), through their respective counsel, hereby stipulate as follows:

WHEREAS the parties entered into a stipulation on March 31, 2014, extending the time for Defendant to file a responsive pleading so that the parties could pursue informal resolution before incurring the costs of litigation ("Joint Stipulation");

WHEREAS the parties' Joint Stipulation was signed by the Honorable Yvonne Gonzalez Rogers on April 2, 2014;

WHEREAS Defendant's response to Plaintiff's First Amended Complaint was extended

1 to April 30, 2014;

2 WHEREAS the parties have agreed to participate in an informal settlement conference in
3 May 2014;

4 WHEREAS the parties continue to desire to defer the costs associated with litigation
5 before attending the informal settlement conference in May 2014;

6 **THEREFORE, IT IS HEREBY STIPULATED BY THE PARTIES AS FOLLOWS:**

7 1. Defendant shall have a 60-day extension to file a responsive pleading to Plaintiff's
8 First Amended Complaint;

9 2. Defendant's response to Plaintiff's First Amended Complaint shall now be due on
10 or before June 30, 2014;

11 3. All other dates, including the deadline to exchange initial disclosures and a joint
12 discovery plan, and the case management conference, shall be scheduled to occur after June 30,
13 2014.

14 Respectfully submitted,

15 Dated: April 28, 2014

JACKSON LEWIS P.C.

17 By: /s/ Kathleen Maylin
18 Kathleen Maylin
19 Joshua A. Kuns
Attorneys for Defendant
Akima Facilities Management, LLC

20 "I hereby attest that I have on file all holographic signatures corresponding to any signatures
21 indicated by a conformed signature (/S/) within this e-filed document."

22 Dated: April 28, 2014

BROCK LAW OFFICE

24 By: /s/ Gregory P. Brock
25 Gregory P. Brock
26 Attorneys for Plaintiff
Daniel Crisostomo

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

3 Having reviewed and considered the parties' above stipulation, the Court hereby finds and
4 orders as follows:

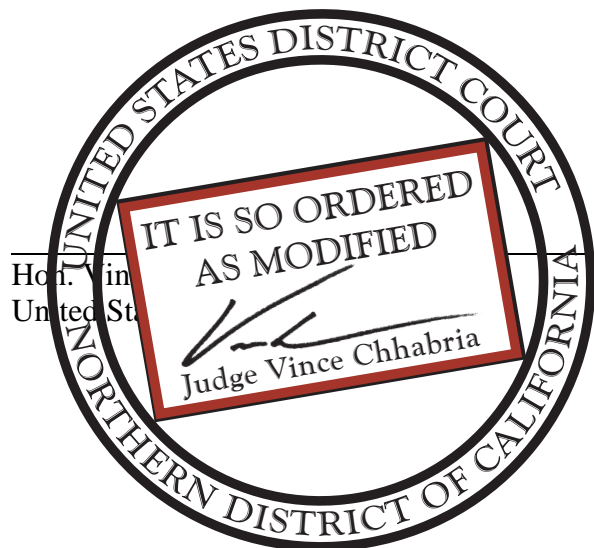
5 1. Defendant's response to Plaintiff's First Amended Complaint shall now be due on
6 or before June 13, 2014;

7 2. All other dates, including the deadline to exchange initial disclosures and a joint
8 discovery plan, and the case management conference, shall be scheduled as follows:

9 A case management conference shall be scheduled for Friday, June 27, 2014, at 10:30 a.m. The
10 joint case management conference statement shall be due no later than June 20, 2014.

11 **IT IS SO ORDERED.**

12
13 Dated: April 28, 2014



4833-1788-7258, v. 2